

EXHIBIT 19
Aug. 30, 2019 Letter from T.
Prado to E. Vandavelde
REDACTED VERSION

Morgan Lewis

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August 30, 2019

VIA E-MAIL

Eric D. Vandeveld, Esq.
Gibson, Dunn & Crutcher LLP
333 South Grand Avenue
Los Angeles, CA 90071-3197
Email: evandeveld@gibsondunn.com

Re: Oracle USA, Inc., et al v. Rimini Street, Inc., et al., Case 2:10-cv-00106-LRH-VCF

Dear Mr. Vandeveld:

I write regarding deficiencies in Rimini's July 18, 2019 response to Oracle's Supplemental Interrogatory No. 5, seeking identification of all of the tax and regulatory updates, break fixes, new or revised functionality, and documentation that Rimini has provided to its customers for the Oracle product lines identified in the Injunction since November 5, 2018, as well as information about the development and distribution of the updates, fixes, functionality, and documentation.

First, Rimini has omitted numerous PeopleSoft and JDE updates from its response. Oracle's Supplemental Interrogatory No. 5 asks for all software updates, fixes, new or revised functionality, and documentation provided to customers on or after *November 5, 2018*. Exhibit D does not appear to identify any updates, fixes, functionality, or documentation sent in 2018. Based on Oracle's ongoing review of [REDACTED]

[REDACTED] Similarly, Rimini's Exhibit D omits [REDACTED]

Second, Rimini appears to have omitted [REDACTED]

Exhibit D also fails to provide all of the information that Rimini agreed to provide for each update. Specifically, Oracle's interrogatory requests, and Rimini agreed to provide, file names as well as

¹ Rimini's response also includes no information related to the Oracle Database and Siebel product lines. Please confirm that Rimini has provided no updates, fixes, functionality, or documentation related to these product lines since November 5, 2018.

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product and version information for each update. Exhibit D does not contain any file names, product names, or version information.

Finally, Supplemental Interrogatory No. 5 also seeks information about the Persons who were involved in developing or testing the updates. Rimini's amended response should include this information, which will permit Oracle to identify those document custodians who had access to Oracle Software and Support Material and were directly involved in the development and distribution of Rimini updates. Identifying developers on a per-update, per-client basis will also allow Oracle to evaluate whether Rimini's staffing is consistent or inconsistent with Rimini's stated position that it independently develops updates for each recipient.

Please provide amended responses to Oracle's Supplemental Interrogatory No. 5 by September 4, 2019 at noon PDT, so that Oracle's experts may address them in any initial expert reports to which they may be relevant. If requested, we are available to meet and confer the afternoon of September 3, 2019.

Sincerely,

/s/ Tania Prado

Tania Prado

TP

C: Jeremy M. Christiansen
Blaine H. Evanson
Joseph A. Gorman
Samuel Liversidge
Brett Long
Shaun Mathur
Casey J. McCracken
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